



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

April 15, 2025

BY ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: **United States v. Andrey Kostin, et al., S2 24 Cr. 91 (GHW)**

Dear Judge Woods:

Having conferred with counsel to defendants Vadim Wolfson and Gannon Bond, the Government respectfully writes on behalf of and with the consent of all parties regarding the three upcoming Court-ordered Rule 15 depositions (the “Depositions”). (Dkt. 105, 147). The Depositions will take place in London, United Kingdom on or about April 22 and 23, 2025, at the office of K&L Gates LLP, 1 New Change, City of London, London EC4M 9AF, United Kingdom. With respect to the administration of any oaths at the Depositions, consistent with the parties’ understanding of the applicable criminal and civil rules and common practice, and absent any Court order to the contrary, the parties have stipulated and agreed that no party shall require a consular officer to administer an oath in connection with the Depositions. *See* Fed. R. Crim. P. 15(e) (referring to applicable civil rules); Fed. R. Civ. P. 30(b)(5) (providing for such stipulations). The parties have further stipulated and agreed that as part of the Depositions, in lieu of a consular officer’s involvement, a court reporter already present shall: (a) ask each of the deponents to acknowledge that his or her testimony will be true under the penalties of perjury; (b) confirm that counsel will not object to the admissibility of the testimony based on proceeding in this way; and (c) confirm that the deponent has verified his or her identity. *Id.* The parties’ stipulation and agreement will be read on the record at the beginning of each of the Depositions.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney

By: _____ /s/
Emily Deininger / David R. Felton / Jane Kim
Assistant United States Attorneys
(212) 637-2472 / -2299 / -2038

cc: Counsel of Record (by ECF)